ORIGINAL

OPEN MEETING AGENDA ITEM



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## BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

GARY PIERCE
CHAIRMAN
BOB STUMP
COMMISSIONER
SANDRA D. KENNEDY

SANDRA D. KENNEDY COMMISSIONER PAUL NEWMAN COMMISSIONER

BRENDA BURNS COMMISSIONER 2012 FEB 14 P 12: 17

AZ CORP COMMISSION DOCKET CONTROL

Arizona Corporation Commission

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IN THE MATTER OF THE APPLICATION OF TUCSON ELECTRIC POWER COMPANY FOR APPROVAL OF ITS 2011-2012 ENERGY EFFICIENCY IMPLEMENTATION PLAN Docket No. E-01933A-11-0055

## **RUCO'S NOTICE OF FILING**

The RESIDENTIAL UTILITY CONSUMER OFFICE ("RUCO") hereby files notice of its support of Tucson Electric Power's ("TEP") Proposed Modified Implementation Plan ("Plan") filed with the Arizona Corporation Commission ("Commission") on January 31, 2012, and supports TEP's request that this matter be placed on an agenda for the February 23, 2012 Open Meeting.

RUCO has participated in the negotiations which resulted in the Plan. The negotiations were open, transparent and each party was provided ample opportunity to participate and express its position. The Plan, in RUCO's opinion, is a reasonable and balanced approach to a very difficult and unique set of circumstances. TEP believes that the Plan will allow it to meet its EE standard, and is in the public interest. The Plan does not include the controversial Authorized Revenue Recovery True-up mechanism ("ARRT"), adopts a program funding level 25% lower than Staff's recommendation, sets the 2012

budget almost \$5 million lower than the budget recommended by Staff, and sets the Demand Side Management Surcharge at \$0.003608 per kWh for residential customers, lower than the Company's \$0.0076031 per kWh or Staff's recommended \$.003812 per kWh. The Plan, if approved would have an average bill impact of 2.39% or a monthly increase of \$2.08 on the residential bill. The parties will have the opportunity to revisit the issue when TEP files its next rate case in July, 2012.

In sum, the Plan is in the public interest and RUCO supports it.

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RESPECTFULLY SUBMITTED this 14th day of February, 2012.

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Company's Exceptions, Exhibit A - Proposed Language

Daniel W. Pozefsky **Chief Counsel** 

AN ORIGINAL AND THIRTEEN COPIES of the foregoing filed this 14th day

of February, 2012 with:

**Docket Control** 

**Arizona Corporation Commission** 

1200 West Washington Phoenix, Arizona 85007

COPIES of the foregoing hand delivered/ mailed this 14th day of Februry, 2012 to:

Lyn Farmer **Hearing Division** 

**Arizona Corporation Commission** 

1200 West Washington Phoenix, Arizona 85007

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